

To the FCC:

November 15, 2004

Please do three things: approve the Video Relay Service (VRS) as a viable and much needed service, require the VRS providers to meet the requirements similar to that of the The Relay Service (TRS), (i.e. 80 percent of the calls must be answered within 10 seconds, 24 hours a day/7 days a week), and provide appropriate reimbursement to the VRS provider so that they meet the requirements.

To expand a bit further: I want you to recognize VRS as a viable relay service for deaf and hard of hearing people. Below is an explanation of what VRS is and what your agency has done to seriously harm and limit the growth of this service.

The VRS for deaf and hard of hearing people who use American Sign Language as their primary mode of communication, is the most functional equivalent technology to using a telephone by hearing consumers. Essentially, deaf VRS users have a camera and computer and use a sign language interpreter at the VRS to translate between themselves and any hearing person, by phone. The phone call could be as serious as a call to a doctor or as simple as ordering a pizza. The point is that the hearing person and the deaf person are using an interpreter, as an intermediary, provided by TRS.

Hearing people use the phone for a million important and unimportant reasons. The majority of deaf people, whose primary language is American Sign Language, can get functional equivalency with the Video Relay Service. They cannot get this with the traditional Relay Service that requires them to type in English on a teletypewriter. For most deaf people, English is a second language that they struggle with, while TRS communication assistants, read what they type to hearing people. The deaf person's English skills are often so weak that conversations get jumbled and misunderstood. Also, typing is quite slow compared to speech, even if the intermediary Communication Assistants (CA's) type 60 wpm, so every conversation takes about three times as long as a spoken conversation. Imagine how frustrated you would feel if ordering a pizza took ten to fifteen minutes of phone time!!! Or a call to your doctor for an appointment took 20 minutes!!

Money has become an additional problem. When VRS started, your agency was reimbursing the VRS providers at the rate of at least \$18.00 per minute. With this reimbursement rate, VRS users were getting interpreters on the screen in less than 30 seconds and the services were offered 24 hours per day, 7 days per week. Although the VRS had not yet been approved by FCC as a viable communications relay service, the VRS providers were meeting or exceeding most of the rules and regulations required of the TRS providers. Because of the superiority of this service compared to the TRS, the VRS industry grew rapidly. In the last year, you have cut the reimbursement rate to almost \$7.00 per minute. As the rates were reduced, the quality of the VRS deteriorated. To survive, the VRS providers cut back on interpreters and the service. Now the wait is often more than 10 minutes and sometimes as long as 45 minutes before an interpreter appears on the CPU or TV screen and the hours are restricted to day times and week days only, when demand is at its peak. Imagine if you had to wait 45 minutes before you could call your doctor for an appointment because the VRS wasn't available! Or, too bad, the VRS isn't available in the evening, so you can't order a pizza. What would you do?

You have requested public comments. Here they are. To repeat: my reason for writing you is to ask you to do the following:

1. approve the VRS as a viable and much needed service
2. require the VRS providers to meet the requirements similar to that of the TRS, (i.e. 80 percent of the calls must be answered within 10 seconds, 24/7, etc.)
3. provide appropriate reimbursement to the VRS providers so that they can meet these requirements.

Sincerely yours,

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